REMARKS

This Application has been carefully reviewed in light of the Office Action mailed December 27, 2005 ("*Office Action*"). Claims 13, 15, 19, 20, and 23-26 are pending in the Application, and the Examiner rejects Claims 13, 15, 19, 20, and 23-26. Applicants respectfully request reconsideration and favorable action in this case.

I. Drawings Objections

Pursuant to M.P.E.P. § 608.02(g), the Examiner requests Corrected Drawings that show Figure 2 with a legend: "Prior Art." *Office Action*, p. 2. Applicants respectfully note that Applicants' response filed on July 1, 2004 included replacement formal drawings that conform to this request. However, with Applicants' response to this *Office Action*, Applicants respectfully resubmit: (1) an annotated marked-up drawing that includes changes to Figure 2 and (2) a replacement sheet showing Figure 2, as amended. Applicants respectfully request that the Examiner withdraw the objection to the drawings.

II. 35 U.S.C. § 103 Rejections

The Examiner rejects Claims 13, 15, 19, 20, and 23-26 under 35 U.S.C. § 103(a) as unpatentable over Applicants' admitted prior art ("AAPA") in view of U.S. Patent No. 5,623,495, which issued to Eng et al. ("*Eng*"). Applicants respectfully traverse the rejection on the ground that AAPA and *Eng*, whether taken alone or in combination, fail to teach or suggest all limitations of the claims.

Consider Applicants' independent Claim 13, which recites:

> A multi-protocol packet-based base station, comprising:
> a wireless signaling logic unit for handling communications with a mobile wireless device using wireless signals adapted for an internet protocol-based local area network;
> a media gateway logic unit adapted to handle communication signals for a media gateway control protocol (MGCP); and
> address generation logic for dynamically generating a virtual circuit identity code (VCIC) associated with the mobile wireless device for linking communication signals between said wireless signaling logic unit and said media gateway logic unit, wherein the VCIC enables signaling, with the mobile wireless device using a first protocol and with a remote endpoint using MGCP, for the establishment of a media communication session between the mobile wireless device and the remote endpoint.

Among other aspects, the AAPA-*Eng* combination fails to teach or suggest "wherein the VCIC enables signaling, with the mobile wireless device using a first protocol and with a remote endpoint using MGCP, for the establishment of a media communication session between the mobile wireless device and the remote endpoint," as required by Claim 13.

As teaching the claimed virtual circuit identity code (VCIC), the *Office Action* points to the virtual path identifier (VPI) discussed in *Eng*. *Office Action*, p. 4. *Eng* describes a portable base station (PBS) for use in a wireless asynchronous transfer mode (ATM) local area network. *Eng*, col. 2, ll. 21-23. *Eng* modifies the traditional ATM virtual path/virtual channel (VP/VC) "so as to eliminate the need for any VP/VC translation in the high speed (Gb/s) portion of intermediate PBS switches. As a consequence, a 'VPI' (virtual path identifier) in the present wireless LAN scheme corresponds to a particular destination PBS, rather than to a virtual path of base stations and links." *Id.*, col. 4, ll. 51-58.

Eng's VPI operates as a PBS destination address that works to specify a particular route through the network. *See id*, col. 4, ll. 65 - col. 5, l.1 ("In other words, all cells with VPI 9a and VPI 9b are routed to the destination PBS 9. Associated with each VPI (Destination ID) is a unique route through the network from each source."). Accordingly, Applicants respectfully submit that *Eng*'s VPI merely enables a particular routing of ATM cells through the ATM network. However, this fails to teach or suggest an identity code that enables signaling between disparate signaling protocols. *Eng*'s discussion of a WATM/ATM converter fails to teach or suggest enabling signaling between disparate signaling protocols: "WATM can be designed essentially the same as ATM except for some header byte redefinition." *Id.*, col. 2, ll. 3-11. Accordingly, *Eng*'s VPI fails to teach or suggest an identity code that enables signaling between any disparate signaling protocols, much less an identity code that enables signaling between a first protocol and MGCP, as required by Claim 13.

Moreover, *Eng* fails to teach, suggest, or even mention a media gateway control protocol or MGCP, much less a remote endpoint using MGCP. The *Office Action* states:

> Furthermore, the VCIC (VPI) enables signaling with the mobile device using a first protocol (wireless ATM or WATM) and as described above, this VPI is used to route traffic on the wired portion of the network, thus enabling the establishment of a media communication session between the mobile wireless device and the remote endpoint.

Office Action, p. 4. However, the *Office Action* fails to assert that the AAPA-*Eng* combination teaches or suggests that the "VCIC enables signaling, with the mobile wireless device using a first protocol and with a remote endpoint using MGCP, for the establishment of a media communication session between the mobile wireless device and the remote endpoint." *See* Claim 1 (emphasis added).

Thus, *Eng* fails to teach or suggest a VCIC that enables signaling, with the mobile wireless device using a first protocol and with a remote endpoint using MGCP, for the establishment of a media communication session between the mobile wireless device and the remote endpoint, as required by Claim 1. AAPA fails to cure the deficiencies of *Eng*.

Applicants thus respectfully submit that AAPA and *Eng*, whether taken alone or in combination, fail to teach or suggest every element of Claim 13. Likewise, independent Claims 15, 23, and 24 include limitations that, for substantially similar reasons, are not taught or suggested by the references. Because AAPA and *Eng*, whether taken alone or in combination, fail to teach or suggest every element of independent Claims 13, 15, 23, and 24, Applicants respectfully request reconsideration and allowance of Claims 13, 15, 23, and 24, and their respective dependent claims.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending Claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

No fees are believed to be due. However, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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